INSPECTION SUMMARY REPORT

Project Number: R02025

Project Name: Waste Minimization Audit

Facility Name: Allied Signal Aerospace

Facility ID #: NJD078714433

Facility Address: Route 46
Teterboro, NJ 07608
Bergen County

Facility Phone Number: (201) 393-2452

Inspector(s): Joseph J. Cerise

Date of Inspection: February 28, 1995

Arrival/Departure: 9:30 AM/12:35 PM

Facility Representative(s): Mark Schwind
Principal Environmental Engineer

Exterior Observations:

- **Weather:** Rain, Freezing Rain, 29-31 degrees F, Overcast, Cloudy, Windy and Breezy
- **Land Use:** The surrounding area is industrial and some businesses. The facility is adjacent to the Teterboro Airport.
- **Sensitive Areas/ Surface Waters:** According to the facility, based on the New Jersey regulations the ditch traversing the site is considered a wetlands.

Operations and Process Description:

Allied Signal Aerospace assembles parts for the Department of Defense. Four activities take place at the Teterboro facility: Research and Development, Engineering, Accounting, and Government Offices. Machining and Maintenance support the R&D and Engineering functions.

Subcontractors manufacture the parts and Allied Signal assembles the parts into components for larger systems at this facility. Allied Signal assembles gyros, fly-by-wire, and test stands. These components are then installed into missiles and aircraft at other sites.

The facility typically generates the following wastes:

- Paints - MEK, reducers
- Oils
- Labpacks
- Freon
- 1,1,1-Trichloroethane

Waste Minimization Plan:

The facility has implemented a Minimum Buy policy. This policy eliminates the purchase of excess stock. Also, there are only two employees who can approve the purchase of chemicals. Chemicals are selected from a list of allowable chemicals. If facility personnel desire to purchase chemicals off that list, they must first obtain a Material Safety Data Sheet for the chemical and obtain approval from the Health & Safety Department, Materials Purchasing and the Environmental Department.

The Waste Minimization Plan identified a Waste Minimization Team chaired by the Environmental Affairs Manager. Representatives from Manufacturing, Quality Engineering and Environmental personnel are to be on the Team. They are to meet semi-annually, create records to document and assess efforts, develop options for reducing waste and liability, and document and track progress in fulfilling the intent of the law. The plan called for setting baseline data, characterizing the wastestreams, and identifying options.

According to the facility representative, the committee has not been fully implemented as a result of cutbacks and layoffs. He said that they have met informally.

The CEO decided to eliminate the use of CFC's in Allied Signal's facilities. The Engineering and Operations Departments were directed to research and develop alternatives, develop a plan and to implement it. A Quarterly Report is published reporting the reduction of ozone depleting substances attained by the company. The results of the Teterboro facility's reductions are included in the report.

Allied Signal also implemented a Solvent Substitution Program in its assembly processes. Operations and the Metallurgy Departments worked together to ensure that the replacement aqueous alkaline rinse meet the QA/QC standards.

Each Allied Signal facility is given an annual goal of waste generation separated between air and solid waste. The Teterboro facility has reportedly been meeting its goals.

Allied Signal participates in an informational exchange with AT&T, Martin Marietta, and Lockheed. Waste minimization options that are identified are reviewed to see if the end product would still meet the DOD standards. The economics of the proposal are then reviewed. The companies then see if anyone else has tried it. The companies may perform testing if no other information can be gathered.

Allied Signal has a Reward and Recognition Program for employees who come up with ways to reduce waste and improve the company.

Allied Signal is a participant in the EPA's 33/50 and Greenlights program.

Implementation of Waste Minimization Plan:

When asked if the Hazardous Waste Minimization Plan had been implemented, the facility representative said that because of the staff layoffs the Waste Minimization Plan had not been fully implemented. Employment at the facility has been reduced from 4,500 employees to 1,100.

The CEO has set the goal of being out of Chlorofluorocarbons (CFCs) by 1995. Allied Signal has eliminated all except for one process line which they have not found an alternative which works effectively.

Allied Signal switched from Trichloroethylene to 1,1,1-Trichloroethane to reduce the toxicity of the solvent used at the facility.

They have eliminated an electroplating process and have switched to an aqueous plating line eliminating the generation of F006 waste.

On one process line, the facility has replaced a solvent cleaning step with an aqueous alkaline rinse. They have not seen a decrease in quality of the end product. Prior to implementing the change, Allied Signal had to prove that Department of Defense Mill Standards could be met.

The machine shop has switched to biodegradable water based oils.

Photographs: None Taken.

Documents Reviewed:

- ISO 9000 Hazardous Waste Minimization Plan *
- 1994 Annual Hazardous Waste Report **

* The facility did not provide a copy of the Plan because according to the facility representative plans that fall under the ISO 9000 Program are not able to be released.

** A summary of the wastestreams, waste codes, a description and the amounts of each wastestream is provided in Attachment I.

Regulatory Concerns: None

Summary:

Allied Signal has taken some proactive steps as a company to reduce waste and has received direction from upper management. But at the facility level, only those projects which upper management directed were being implemented. When asked why the provisions of the waste minimization plan were not being implemented, the facility representative stated that the lay-offs had affected the implementation.

ATTACHMENT I

Hazardous Waste Generated in 1994

Wastestreams by Waste Code	Description	Volume
D001, D006, D008, D018, D035	Petroleum Naptha from Parts Cleaning Operations	12,410 lbs.
D001, D002, D009, F002	Labpacks - R&D and Production	109,000 lbs.
D001	Paint Thinner	11,600 lbs.
F002	Spill Clean-up debris 1,1,1-Trichloroethane (1-10%)	4,000 lbs.
D002	Degreasing Operation	24,000 lbs.
D009	Mercury from dicarded thermometers	600 lbs.
P030	Discarded laboratory chemical	100 lbs.
F003	Flammable Liquids 5% Methyl Ethyl Ketone 5% Acetone	43,260 lbs.
F001	Degreaser 1,1,1-Trichloroethane	160,090 lbs.
D001	Compressed Hydrogen	400 lbs.
F001	1,1,1-Trichloroethane (1%) and Rags	4,000 lbs.
D002		4,000 lbs.
D002	Hydrochloric Acid (10%)	1,200 lbs.
D002, U134	Hydrofluoric Acid Soln.	400 lbs.
D001, P015		2,250 lbs.
F001	Trichlorotrifluoroethane from Vapor degreasing operations.	9,880 lbs.

D040, U228, U080	Trichloroethylene, Methylene Chloride	1,200 lbs.
D004	500 ppm Arsenic	7,000 lbs.
U228	Trichloroethylene	6,410 lbs.
F001	Trichloroethylene (90%) 1,1,1-Trichloroethane (10%)	6,353 lbs.
D009	Mercury	1,260 lbs.
F003	Isopropanol (5%), Acetone (5%), Xylene (5%), Methyl Ethyl Ketone (5%), Thinner (10%), Petroleum product (70%)	24,310 lbs.

D040, U228, U080	Trichloroethylene, Methylene Chloride	1,200 lbs.
D004	500 ppm Arsenic	7,000 lbs.
U228	Trichloroethylene	6,410 lbs.
F001	Trichloroethylene (90%) 1,1,1-Trichloroethane (10%)	6,353 lbs.
D009	Mercury	1,260 lbs.
F003	Isopropanol (5%), Acetone (5%), Xylene (5%), Methyl Ethyl Ketone (5%), Thinner (10%), Petroleum product (70%)	24,310 lbs.

United States Environmental Protection Agency
Air and Waste Management Division - Region 2

Waste Minimization Audit
Facility Information

Date 2·28·95 Time 9:45

Facility Name Allied Signal Aerospace

EPA ID# NJD078714433

Street Address Rte 46,

Teterboro, NJ 07608

Mailing Address Same

Point of Contact (Name/Title) Mark Schwind

Staff Environmental Eng.

Telephone (201) 393-2452

Fax # (201) 393-6553

Inspector (Name/Title) Joseph J Cerise

Consultant

Inspector's Telephone (212) 425·5470

Waste Minimization Audit

A. Facility Overview

1. Describe Facility Operation
See notes

2. SIC code(s) 3011
3. List Waste Generated (Waste Code, Amount/Month, Discharge)

Waste Code	Amount	Air Emission/Waste Water/Haz Waste
D001, D002, D009 F002	10,900 lbs	R&D Lab; Lab Packs
See Notes		

4. Describe how each waste stream is generated
See notes

5. Describe Disposal Management Practices
(Onsite/Offsite/TSDF/Treatment/Recycle)

	Safety Kleen
	Bethlehem Apparatus
	Mansol
	AETC

B. Waste Minimization Program

1. Waste Minimization Plan

Describe Overall Plan (__✓__ Written ____ Verbal)
(Obtain copy of written plan)

Could not obtain a copy of plan; see notes for summary

2. Waste Minimization Options Implemented for waste codes described (Project Outline/Waste Stream Reduction Goals/Date?Method of Implementation Resources/Accomplishments/Reduction Calculations)

See notes -

Lab wastes

- Minimum Buy

Paints

- Have to meet Military Standards

Cutting Oils

Eliminated replaced w/ aqueous, biodegradable oils

Plating - Eliminated

3. For each Waste Minimization Project Implemented Describe Benefits, (i.e., Financial, Facility Operations, Product, Waste Management)

Driving force behind Waste Minimization Efforts is Quality

4. Waste Minimization Options Explored for waste codes (Describe actual steps taken to implement options, provide documentation), (i.e., phone correspondence, journal reviews, etc.)

See notes

Joint Program - AT&T, Martin Marietta, Lockheed

No information given for facility waste minimizations efforts

C. Company's Commitment

1. What role do the following individuals play in the waste minimization program, (i.e., Support, Suggestions, Incentives)

Upper Manager

Chairman - decided on solvent elimination; give direction many factors.

Departmental (Engineering, Quality Control, Accounting, Purchasing, Legal)

see notes on departments roles —

Engineering - direct involvement; very supportive (Quality Control — same)

Acctg - little role (NA) Purchasing - supportive - know what can be bought, etc Legal - very little involvement

Operations Personnel (i.e., Equipment Operators, Line Workers, etc.)

aware of what is going on — i.e what standard they have to meet; TQM - people empowered to suggest

D. Regulatory Requirements

1. Which of the following concerns the facility:
   - ✓ Ozone (Clean Air)
   - _ Thermal (Waste Minimization - Combustion Strategy)
   - _ Waste Minimization State/Federal Requirements

Ozone Depletion

2. Did the facility eliminate the use of ozone Depleting Chemicals?

YES ____ Date/Method

_____

NO ✓ Planned Date/Method

Goal to be out in 1995 - They know of one exception no substitute

Thermal Unit

3. Does the facility treat waste using combustion management units? _____ YES _____ NO

Manifest

4. Does the facility sign and understand manifest certification requiring waste minimization efforts?

✓ YES _____ NO

E. Compliance Assistance

1. Does company want addition information or guidance an any of the following: Waste Minimization Program Development, Technical Assistance materials, Clean Air Act, Ozone Depleting Chemicals, Combustion Initiative, Recycling?

_____ NO ✓ YES (Specific Requests)

F. Multi-Media Checklist
(Complete Checklist Attached)

Form HWM-004
7/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

~~[illegible]~~
2 Babcock Pl. W. Orange, NJ 07052

NOTICE OF VIOLATION

ID NO. NJD078714433 DATE 12-15-89

NAME OF FACILITY Allied Signal/Bendix Aerospace Co.

LOCATION OF FACILITY RT 46 Teterboro, NJ 07608

NAME OF OPERATOR Matt Watson

You are hereby NOTIFIED [illegible]
violation(s) of the Solid Waste Management Act [illegible]
7:26-1 et seq. [illegible]
58:10-23.11 [illegible]
These violation(s) [illegible]

DESCRIPTION OF VIOLATION [illegible]

~~to use proper EPA ID #~~ [illegible]
~~on manifest~~ NJAC [illegible]
[redacted] NJAC [illegible]
Obtain written approval [illegible]
Haz waste in one above [illegible] 90
days or less.

Remedial action to correct these violations must be initiated [illegible]
Jan. 14, 1990 Within ~~[illegible]~~ 30 days of [illegible] you shall submit in writing, to the investigator issuing this notice [illegible] you have taken to attain compliance. The issuance of this [illegible] violation has occurred and does not preclude the State of New Jersey [illegible] ating further administrative or legal action, or from assessing [illegible] violations. Violations of these regulations are punishable by penalties [illegible]

NJ DEP Haz waste Adv1sement
(609) 292-8341
EPA-RCRA Hotline
1-800-424-9346
* ~~CT 8 0075809~~ rescinded
* NJA 048657

Jackie M. Stein
Investigator, Division of Waste Management
Department of Environmental Protection

741(a)4vi

AETC
ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION
1 EDEN LANE, FLANDERS, NEW JERSEY 07836 201-347-7111

December 7, 1989

Department of Environmental Protection
Division of Waste Management
Bureau of Manifest and Information Systems
CN028
Trenton, NJ 08625

Gentlemen:

This notice is being sent to your office to inform you of a manifest discrepancy that has been identified.

Attached is a discrepancy notification form. This form identifies the information that is incorrect and gives the correct information so that you may make the necessary changes in your records. Also attached is a copy of this manifest.

We regret any inconvenience this error may have caused. If you should have any questions or comments, please contact me at (201) 347-1909.

Very truly yours,

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION

Gerald Schlomer
Manager, Facility

GS/jg
Encl.
pc:Allied Signal Aerospace
Teterboro, NJ

DISCREPANCY NOTIFICATION FORM

Manifest Number: NJA00+80657

Generator: Allied Signal Aerospace

Date Shipped: 3/02/89

The item(s) checked below have been determined to be incorrect on the above referenced manifest. The information that should appear on the manifest is shown next to the applicable section.

Section

___ GENERATOR'S ID

___ TRANSPORTER 1 ID #

___ DOT DESCRIPTION
Page ___ Section ___

Line Number ___

___ NUMBER OF CONTAINERS
Page ___ Section ___

Line Number ___

___ TYPE OF CONTAINER
Page ___ Section ___

Line Number ___

___ TOTAL QUANTITY
Page ___ Section ___

Line Number ___

___ UNITS
Page ___ Section ___

Line Number ___

___ WASTE NUMBER
Page ___ Section ___

Line Number ___

___ HANDLING CODES
Page ___ Section ___

Line Number ___

OTHER Section 10, US EPA ID Number should read: NJD080631369

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires [illegible]

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible]
Manifest Document No. [illegible]
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ALLIED SIGNAL [illegible]
[illegible]
TETERBORO, NJ 07608

4. Generator's Phone (201) 393-2052

A. State Manifest Document Number **NJA 0480657**

B. State Generators ID
SAME

5. Transporter 1 Company Name
ENVIRONMENTAL TRANSFER CORP.
6. US EPA ID Number
NJD991291584

C. State Transporter's ID [illegible]

D. Transporter's Phone [illegible]

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
[illegible] ENVIRONMENTAL TECHNOLOGY CORP.
GOLDMINE RD.
FLANDERS, N.J. 07836

10. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X WASTE, SODIUM AZIDE POISON B UN1687	01	DM	012	P	[illegible]
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. LACK LAB CHEMICALS
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. [illegible]
b.
c.
d.

15. Special Handling Instructions and Additional Information
TRANSPORTATION [illegible]
PACKING SLIPS ATTACHED FOR IDENTIFICATION OF MATERIALS

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MATTHEW D. [illegible]
Signature: [signature]
Month Day Year: 05 10 [illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [signature]
Month Day Year: 05 10 [illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Patrick J. [illegible]
Signature: [signature]
Month Day Year: [illegible]

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

TSD FACILITY COPY

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

NJA 0480657

HW-007 (REV. 9-86)

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NJD078714433
Manifest Document No. NJ10477
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
ALLIED SIGNAL AEROSPACE
RT. 46 MAILSTOP 1/2J
TETERBORO NJ. 07608
4. Generator's Phone (201) 393-2452

A. State Manifest Document Number NJA 0480657
B. State Generator's ID SAME
C. State Transporter's ID NJDER6321 23607
D. Transporter's Phone (201) 347-2215
E. State Trans. ID
F. Transporter's Phone
G. State Facility's ID N/A
H. Facility's Phone (201) 347-1909

5. Transporter 1 Company Name: ENVIRONMENTAL TRANSFER CORP.
6. US EPA ID Number: NJD991291580
7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
ADVANCED ENVIRONMENTAL TECHNOLOGY CORP.
GOLDMINE RD,
FLANDERS, NJ. 07836
10. US EPA ID Number

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	12. Containers No	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. X WASTE, SODIUM AZIDE POISON B UN1687	01	DM	010	P	P105
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
a. PACK LAB CHEMICAL
b.

K. Handling Codes for Wastes Listed Above
a. 501
c.
b.
d.

NJ EPA ID
AETC

15. Special Handling Instructions and Additional Information
PACKING SLIP ATTACHED FOR CLASSIFICATION OF MATERIALS (TRANSPORTATION Only)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: MATTHEW D. WATSON
Signature: MDWatson
Month Day Year: 03 02 89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: CEDRIC ELLINGSWORTH
Signature: Cedric Ellingsworth
Month Day Year: 03 02 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19
Printed/Typed Name: MARK J. [illegible]
Signature
Month Day Year: 03 02 89

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

EPA Form 8700-22 (Rev. 3/88) Previous editions are obsolete

3 — TSD MAIL TO GENERATOR

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

NJA 0480657

II. Generator ALLIED SIGNAL AEROSPACE Manifest Number NJA [illegible]7

The following restricted materials are on this manifest:

___ P001
___ P004
___ P005
___ P010
___ P011
___ P012
___ P015
___ P016
___ P018
___ P020
___ P030
___ P036
___ P037
___ P039
___ P041
___ P048
___ P050
___ P058
___ P059
___ P063
___ P068
___ P069
___ P070
___ P071
___ P081
___ P082
___ P084
___ P087
___ P089
___ P092
___ P094
___ P097
___ P102
X P105
___ P108
___ P110
___ P115
___ P120
___ P122 (when present at concentrations greater than 10%)
___ P123

___ U007
___ U009
___ U010
___ U012
___ U016
___ U018
___ U019
___ U022
___ U029
___ U031
___ U036
___ U037
___ U041
___ U043
___ U044
___ U046
___ U050
___ U051
___ U053
___ U061
___ U063
___ U064
___ U066
___ U067
___ U074
___ U077
___ U078
___ U086
___ U089
___ U103
___ U105
___ U108
___ U115
___ U122
___ U124
___ U129
___ U130
___ U133
___ U134
___ U137
___ U151
___ U154
___ U155
___ U157
___ U158
___ U159
___ U171
___ U177
___ U180
___ U185
___ U188
___ U192
___ U200
___ U209
___ U210
___ U211
___ U219
___ U220
___ U221
___ U223
___ U226
___ U227
___ U228
___ U237
___ U238
___ U248(when present at concentrations 0.3% or less)
___ U249(when present at concentrations 10% or less)

___ F006(Wastewater)
___ F007
___ F008
___ F009
___ F019
___ K004(Wastewater)
___ K008(Wastewater)
___ K011
___ K013
___ K014
___ K017
___ K021(Wastewater)
___ K022(Wastewater
___ K031
___ K035
___ K036(Wastewater)
___ K046(Explosive non-wastewaters)
___ K060(Wastewater)
___ K061(Wastewater)
___ K069(Calcium sulfate subcategory)
___ K069(Wastewater)
___ K073
___ K083(Except no ash subcategory)
___ K084
___ K085
___ K086(Solvent sludge, caustic water wash and sludge subcategory)
___ K101(High arsenic subcategory greater than 1%)
___ K102(High arsenic subcategory greater than 1%)
___ K106

III.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracte to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is tru accurate, and complete. I am aware that there are significant penalties for submitting false information, includi the possibility of fine and imprisonment.

IV. Waste analysis data is/is not attached. (circle one)

V. Signature MDWatson

Printed Name MATT WATSON

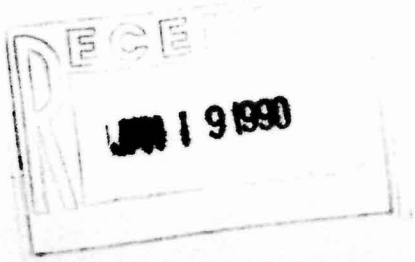
Title ENV. ENGINEER Date 3/2/89

Allied-Signal Aerospace Company

Guidance Systems Division
Teterboro, New Jersey 07608
Telephone (201) 288-2000

Allied Signal

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
2 Babcock Place
West Orange, New Jersey 07052



January 10, 1990

Attention: Ms. Jodie Stein

Subject: Notice of Violation of the
Solid Waste Management Act

Dear Ms. Stein:

Allied Signal Aerospace Company, Teterboro facility is in receipt of and has reviewed the notice of violation dated December 15, 1989, concerning the violations of NJAC 7:26-7.4(a)4viii, NJAC 7:26-7.4(a)vi and NJAC 7:26-9.3(b).

The following corrective action noted below, to attain regulatory compliance, has been undertaken and/or provides the rationale why additional action is not warranted for the alledged violation:

1. NJAC 7:26-7.4(a)4viii - Use of Improper Waste Code on Manifest Number CT B 0075809 dated August 12, 1987.

   Allied Signal notes that the waste codes used for the subject manifest were proper and in compliance with the receiving state, Connecticut, manifesting regulatory code requirements. It is also in concert with the NJAC regulatory code 7:26-8.16, Hazardous Constituents, which covers N.J. requirements for a waste stream with hazardous constituents. i.e., The subject waste containing a hazardous constituent, formaldehyde, was classified as a hazardous waste by Allied Signal, the generator, pursuant to NJAC 7:26-8.6 and 8.7. However, the State of Connecticut in accordance with 40 CFR Part 261, its controlling document, does not recognize the subject material as a hazardous waste. Per Connecticut regulatory code, specialize waste streams/material under which this would be classified - control cognizance falls under "List of Non-Hazardous, Connecticut Regulatory Wastes", copy enclosed.

   Abiding by this regulation, the proper classification under Connecticut regulation and its codes is CR04. This also conforms to the manifesting requirements for NJ State manifest form under reference instruction (I).

2. NJAC 7:26-7.4(a)4vi - No TSD EPA ID Number for Manifest Number NJA 048657.

   Allied Signal Aerospace Company's lab pack contractor, Advanced Environmental Technology Corporation, forwarded a letter of manifest discrepancy to the Bureau of Manifest and Information Systems on December 7, 1989, correcting this discrepancy. Copy enclosed.

3. NJAC 7:26-9.3(b) - Failure to Obtain Written Approval from the Department to Store Hazardous Waste in an Above Ground Tank for 90 Days or Less.

   This was apparently overlooked at the time the facility status as a TSDF under its Part "A" was withdrawn and reclassified to that of a generator status only. This subsequent approval apparently led to the misconception that the subject tank, per se was included in the approval.

   Correcting this misconception, ASAC has filed with the Bureau of Hazardous Waste Engineering, the proper documentation requesting the Bureau's approval for the subject tank and secondary containment area. Copy enclosed.

Allied Signal Aerospace Company trusts that this meets with the Department's approval, and if there are any questions, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Environmental Engineer
MSS/sk
Enclosures (3)

cc: W. Hooper
D. Leak

Rev./9/23/86

LIST OF NON-HAZARDOUS, CONNECTICUT REGULATED WASTES

(NOTE:) These are wastes which are neither characteristically nor listed Hazardous Wastes as per 40 CFR 261, but a facility permit is required by Section 22a-454 of the Connecticut General Statutes for a person engaged in the business of storage, treating, disposing or transporting* them.

Waste #	Waste Name	Description
CR01	Waste PCBs	are any waste material containing or contaminated by PCBs (Polychlorinated Biphenyls) in concentrations at or above 50 ppm (parts per million). These include, but are not limited to, PCB oils, items and equipment.
CR02	Waste Oil	is oil or petroleum that is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties, and is not miscible in water. These include, but are not limited to, crude oil, fuel oil, lubricating oil, kerosene, diesel fuel, motor oil, non-halogenated oil, and oils that are recovered from oil separators, oil spills, or tank bottoms.
CR03	Waste Water Soluble Oil	is oil or petroleum that is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties, and is miscible in water. These include, but are not limited to, cutting oil emulsions or coolants.
CR04	Waste Chemical Liquids	are any wastes that are liquid, free flowing and/or contains free draining liquids and are toxic, hazardous to handle and/or may cause contamination of ground and/or surface water if improperly managed. These wastes may include, but are not limited to paint wastes, grinding wastes, and waste sludges.
CR05*	Waste Chemical Solid	means any chemical solid or semi-solid from a commercial, industrial, agricultural, or community activity.

* The Connecticut General Statutes do not require the transporter to be licensed to transport CR05 (Waste Chemical Solid)

Check Pt. A -
D.B. has 15,000 G's
S01
- If the three (3) tanks are the only TSD activity than Change the notifiers list accordingly

Sub. - C03 7/24/85
app. - C10 4/2/86

Need more info. How many tanks originally? Is this all?

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.
DIRECTOR

RICHARD C. SALKIE, P.E.
ASSOCIATE DIRECTOR

Bendix Corp.

APR 2 1986

(Not in PDS) - 12/22/86

Mr. William Hooper, Manager
Plant Engineering
Allied Bendix Corporation
Teterboro, New Jersey 07860

RE: Approval of Hazardous Waste Storage Tanks Closure Plans for Allied Bendix Corporation, Teterboro, EPA ID No. NJD 078 714 433, NJ Facility No. CP-84-21

Dear Mr. Hooper:

The Bureau of Hazardous Waste Engineering (the Bureau) has completed a review of the closure plans for hazardous waste tank storage for the above referenced facility dated July 24, 1985. The New Jersey Department of Environmental Protection (NJDEP) finds the plans in compliance with the criteria set forth in Subchapter 9 of N.J.A.C. 7:26.

Allied Bendix Corporation is hereby authorized to close the subject three (3) hazardous waste storage tanks according to the approved closure plans and as follows:

1. Remove all hazardous waste from the storage tanks and manifest off-site to an authorized hazardous waste facility.

2. The tanks and any associated equipment shall be thoroughly washed with clean solvent.

3. The tank surface and any surrounding surface which may have come in contact with hazardous waste shall be cleaned, by sandblasting or equivalent means to remove all residues of hazardous waste.

4. All sandblasting residues as well as any waste wash solvents from the above operations shall be collected and manifested off-site to an authorized hazardous waste facility.

5. Allied Bendix Corporation shall sample and analyze the soil in accordance with the approved soil sampling and analysis plan. The company shall notify the Bureau at least two (2) weeks prior to sampling to arrange to have an auditor present during field sampling.

APR 2 1986

6. Closure activities shall be completed within 180 days of the date of this approval.

7. Within thirty (30) days after the closure is completed, the owner or operator shall submit to the NJDEP certification both by the owner or operator and by an independent registered professional engineer that the tank has been closed in accordance with the specifications in the approved closure plan.

Should you have any questions on this matter, please contact Ali Chaudhry of my staff at (609) 633-2970.

Very truly yours,

Edward J. Londres, P.E.
Assistant Director
Engineering

EP11:vb
c: Angel Chang, USEPA, Region II
Chris Andreas, BEMSA

9.3(b)

Allied-Signal Aerospace Company

Guidance Systems Division
Teterboro, New Jersey 07608
Telephone (201) 288-2000

Allied Signal

New Jersey Department of Environmental Protection
Bureau of Hazardous Waste Engineering
Division of Hazardous Waste Management
33 Arctic Parkway
Trenton, New Jersey 08625

January 15, 1990

Attention: Mr. Tom Sherman

Reference: NJAC 7.26-9.3(b) Department's Approval of Hazardous Waste On-Site Accumulation in Above-Ground Tank for 90 Days or Less

Dear Mr. Sherman:

In accordance with the above reference, Allied Signal Aerospace Company, Teterboro facility hereby requests the Department's approval for the use of a 5,000 gallon above-ground storage tank for the accumulation of spent cupric chloride etchant.

Pursuant to this, the following information is being supplied to the Department to facilitate in the approval process:

1. The shell thickness of the tank walls is .3125 inches with the dishes being .250 inches, with the structural layers being fabricated from Iaophthalic. In addition to this, an inner surface liner and 100 mil back-up layer fabricated wth Atlac 382 being reinforced with one-ply of 10mil "C" glass surface veil, is provided.

2. The controls to prevent overfilling of the tank, in accordance with NJAC 7:26-10.5(c), is a high liquid level alarm system, comprised of visual and audible alarms which is activated upon the tank reaching three quarters capacity, at which time, the system generating the material would be turned off by the operator until such time the material can be shipped offsite.

   In addition, Allied Signal Aerospace Company notes that the operational characteristics of this specific manufacturing operation is such that in complying with NJAC 7:26-9.3, "Accumulation of Hazardous Waste for 90 Days or Less", approximately 2,500 gallons of waste is generated within the allotted timeframe.

3. Secondary containment is provided in accordance with NJAC 7:26-10.5(d) as verified by the enclosed blueprints. Although the containment area is designed to provide capacity in excess of the tank volume, (128%), a tank rain skirt is also provided to eliminate the accumulation of precipitation within the containment area.

4. The tank is designed in such a manner which permits over 99% of the tank volume to be removed upon disposal of the spent etchant.

5. The tank is rendered empty as defined in NJAC 7:26-1.4, upon disposal of spent etchant.

6. All waste removed from the tank is shipped as a hazardous waste to an EPA approved facility, as defined in NJAC 7:26-1.4.

7. Allied Signal Aerospace Company is in compliance with the personnel training and preparedness and prevention, contingency plans and emergency procedures which is demonstrated by Allied's Spill Prevention, Control and Countermeasure Plan (copy enclosed).

8. The tank is not below grade.

9. The tank is appropriately labeled as hazardous waste.

Allied Signal Aerospace Company trusts this meets with the Department's approval, and if there are any questions, and/or additional information is required, please do not hesitate to contact the undersigned at 201-393-2452.

Sincerely,

Mark S. Schwind
Environmental Engineer
MSS/sk
Enclosures

cc: D. Leak
W. Hooper

Let's protect our earth

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
John J. Trela, Ph.D., Acting Director
401 East State St.
CN 028
Trenton, N.J. 08625
609 - 633 - 1408

JUN 24 1987

Mr. William Hooper, Manager
Plant Engineering
Allied Bendix Aerospace
Teterboro, NJ 07860

Dear Mr. Hooper:

RE: Reclassification of Allied Bendix Aerospace, Teterboro, EPA ID No. NJD 078 714 433

The Bureau of Hazardous Waste Engineering (the Bureau) has reviewed the closure certification for the hazardous waste storage tanks submitted by Allied Bendix Aerospace dated July 18, 1986. The Division of Hazardous Waste Management inspected the subject facility on October 21, 1986. The Department has determined that the subject three hazardous waste storage tanks have been closed in accordance with the approved closure plan dated April 2, 1986 and N.J.A.C. 7:26-9.8.

The Bureau has reviewed the Part A application submitted by Allied Bendix Aerospace, Teterboro plant, to the USEPA and finds that the following activities are included in the subject facility's Part A application.

1. Hazardous Waste Storage in Containers (S01)-3,300 gallons.

2. Hazardous Waste Treatment in Tanks (T01)-220,000 gallons per day.

3. Hazardous Waste Storage in Tanks (S02)-26,300 gallons.

The S01 activities at this location were classified solely as generator of hazardous waste and T01 activities were classified as Industrial Waste Management Facility (IWMF) by the Department on November 18, 1983. As indicated above the S02 activity at the subject facility has been closed and certified by Allied Bendix Aerospace.

However, please be advised that submission of a ground water monitoring plan in accordance with N.J.A.C. 7:14A-6 for the underground hazardous waste storage tanks may be required. The Bureau is sending this information to:

Robert Berg, Chief
Bureau of Ground Water Quality Management
Division of Water Resources

JUN 24 1987

New Jersey Department of Environmental Protection
401 East State Street
Trenton, New Jersey 08625
Telephone: (609) 292-0424

Please contact the above Bureau to ensure compliance with the Division of Water Resources's regulations for the underground tanks used to store hazardous waste in the past.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities". To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act. N.J.S.A. 13:1E-1 et seq.

This written acknowledgement of the exclusion of the subject company from TSD facility requirements under N.J.A.C. 7:26-1 et seq. is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities not occurring at the site mentioned above.

The issuance of this delisting letter by the Department does not indicate, or imply, and should not be construed as a waiver of any requirements pursuant to the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq. and regulations promulgated thereunder concerning the New Jersey Pollutant Discharge Elimination System, N.J.A.C. 7:14-1 et seq. If your facility is in any of the regulated categories identified in the above cited regulations, you are hereby directed to apply for any and all permits necessary within ninety (or 180 days - at the option of DWR) to the Bureau of Ground Water Discharge Permits, CN 029, Trenton, NJ 08625. Applications may be obtained by calling (609) 292-0424.

If you have any questions on this matter, please feel free to contact Ali Chaudhry at (609) 292-9880.

Very truly yours,

Ernest J. Kuhlwein Jr.

Ernest J. Kuhlwein, Jr., Acting Chief
Bureau of Hazardous Waste Engineering

EP11/vb
c: Lori Amato,USEPA
Robert Berg, DWR
Karl Delaney, BCTS
Tom Sherman,BHWE

Let's protect our earth

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
Lance R. Miller, Acting Director
CN 028
Trenton, N.J. 08625-0028
(609) 633-1408
Fax # (609) 633-1454

log

NJD078714433

FEB 02 1990

2/28/90

CMT 10: SO2 LN 90 days approved

Mark S. Schwind
Environmental Engineer
Allied-Signal Aerospace Company
Guidance Systems Division
Teterboro, New Jersey 07608

RE: Less Than Ninety (90) Day Accumulation of Hazardous Waste in an Above-Ground Tank, Allied-Signal Aerospace Company, Guidance Systems Division, Teterboro, EPA ID No. 078 714 433, TS-90-2

Dear Mr. Schwind:

The Bureau of Hazardous Waste Engineering (Bureau) has reviewed your January 15, 1990, submittal concerning less than ninety (90) day accumulation of hazardous waste in an above-ground horizontal five thousand (5000) gallon iaophthalic tank (Tank). The Bureau has found the submittal to be in compliance with N.J.A.C. 7:26-9.3(b). Therefore, the Bureau hereby approves accumulation of hazardous waste spent cupric chloride etchant in the Tank for less than ninety (90) days provided the following conditions are maintained:

1. The Tank shall have sufficient shell thickness to prevent rupture or collapse. Visual inspection of iaophthalic plastic tank shall be conducted to determine if any significant deterioration evidenced by obvious wall thinning, discoloration, disintegration, crazing, softening, swelling, indentations or delamination has occurred. In case of any significant deterioration observed during the visual inspection, the facility shall immediately notify the Bureau and discontinue use.

2. The controls to prevent overfilling shall be maintained in accordance with N.J.A.C. 7:26-10.5(c);

3. The Tank secondary containment area shall be maintained as specified in the aforementioned submittal and shall meet all the requirements specified under N.J.A.C. 7:26-10.5(d);

4. The tank shall be maintained so that at least ninety nine (99) percent of the volume of the tank can be emptied by direct pumping or drainage;

5. The Tank is rendered empty every ninety (90) days or less as defined by N.J.A.C. 7:26-1.4;

FEB 02 1990

6. All waste removed from the Tank shall be shipped off-site to an authorized facility as defined in N.J.A.C. 7:26-1.4;

7. Allied-Signal Aerospace Company shall comply with the requirements for owners or operators of hazardous waste facilities under N.J.A.C. 7:26-9.4(g), 9.6 and 9.7 concerning personnel training, preparedness and prevention, contingency plans and emergency procedures.

8. The Tank shall be clearly labeled or marked with the words "Hazardous Waste".

The facility must submit to the Bureau an engineering drawing of the Tank and the secondary containment system, signed and sealed by a New Jersey Licensed Professional Engineer within thirty (30) days from the date of this letter.

If you have any further questions, please call Mr. Yefim Kantor of my staff at (609) 292-9880.

Very truly yours,

Thomas Sherman

Thomas Sherman, Chief
Bureau of Hazardous Waste Engineering

EP11/cfd

c: Barry Tornick, USEPA, Region II
Yacoub Yacoub, BME

DOCUMENT: ALLIED2
FOLDER: CFDMOB

AlliedSignal
AEROSPACE

AlliedSignal Inc.
Guidance & Control Systems
Teterboro, NJ 07608-1173

201 288 2000

please copy all pages

U.S. EPA, Region II
290 Broadway
New York, NY 10007-1866

8 March 1995

Dear Sirs:

AlliedSignal Aerospace, EPA ID # NJD078714433, regrets that it neglected to include copies of four land disposal restrictions in its Hazardous Waste Manifest files for 1992, as noted in an EPA letter dated 21 February 1995.

In order to correct this error, we have procurred these LDR's and incorporated them into our files. Attached are copies of manifests NJA 0996947, NJA 0996961, NJA 0996964, and ILO 3412239, and the LDR for each.

We hope that this action satisfies the Agency in regard to the noted violation of 40 C.F.R. Part 268. If you have any further questions or comments, please contact the undersigned. Thank you.

Sincerely,

Daniel P. White

Daniel P. White
Environmental Scientist

VHW-001 (REV. 9/86)

8

Please type or print in block letters. (Form designed for use on...

Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 9 1 4 4 3 3 1 Document No. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Allied Signal Aerospace Company- Teterboro Facility
Route 46, Teterboro, N.J. 07608

4. Generator's Phone (201) 393-2724

A. State Manifest Document Number **NJA 0996947**

B. State Generator's ID
Same

5. Transporter 1 Company Name
Chemical Waste Management, Inc.

6. US EPA ID Number I L D 0 9 9 2 0 2 6 8 1

C. State Trans. ID NJA? 51 0331

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (201) 465-2121

E. State Trans. ID

9. Designated Facility Name and Site Address
Chemical Waste Management of New Jersey, Inc.
100 Lister Avenue
Newark, N.J. 07105

10. US EPA ID Number N J D 0 8 9 2 1 6 7 9 0

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (201) 465-9100

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ Hazardous Waste Liquid, NOS Metal Hydroxide Salts, ORM-E F006, NA 9189	0 0 1	T T	X 4800	G	F 0 0 6
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
a. L/T: Metal Hydroxide Salts 15% Trace Heavy Metals, Water 85%
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
In case of spill or accident, contact CWM 24-Hour emergency response telephone number (205) 652-9721, and refer to attached DOT Guide number 31.
CWM WO #A33858 Decal #4095 Profile # K33625

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Gary Bedrosian — Signature: Gary Bedrosian — Month 03 Day 19 Year 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Lorg Patterson — Signature — Month 03 Day 19 Year 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

8 — GENERATOR COPY

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

NJA 0996947

-2712

Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

8

Type or print in block letters. (Form designed for use on elite (12 pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30

UNIFORM HAZARDOUS WASTE MANIFEST	N J D 0 7 8 7 1 4 4 3 3 1	000008	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Allied Signal Aerospace Company- Teterboro Facility
Route 46, Teterboro, N.J. 07608

4. Generator's Phone 201 393-2724

A. State Manifest Document Number
NJA 0996947

B. State Generator's ID
Same

5. Transporter 1 Company Name
Chemical Waste Management, Inc. I L D 0 9 9 2 0 2 6 8 1

C. State Transporter's ID
NJDEP S1 0331

E. Transporter's Phone 201 465-2121

6. Designated Facility Name and Site Address
Chemical Waste Manggement of New Jersey, Inc.
100 Lister Avenue
Newark, N.J. 07105 N J D 0 8 9 2 1 6 7 9 0 201 465-9100

7. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	8. Containers No.	Type	9. Total Quantity	Unit Wt./Vol.	10. Waste No.
X RQ Hazardous Waste Liquid, NOS Metal Hydroxide Salts, ORM-E F006, NA 9189	001	TT	X4800	G	F006

11. Special Handling Instructions and Additional Information
L/T: Metal Hydroxide Salts 15%
Trace Heavy Metals, Water 85%

12. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
S09 H01

13. Special Handling Instructions and Additional Information
In case of spill or accident, contact CWM 24-Hour emergency response telephone number (205) 652-9721, and refer to attached DOT Guide number 31.
CWM WO #A3358 Decal #00258 Profile # K33625

14. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Gary Bedrosian
Signature: Gary Bedrosian
Month Day Year: 10 31 92

15. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: LUKE PATTERSON
Signature:
Month Day Year: 10 31 92

16. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

17. Discrepancy Indication Space

18. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Timothy J McElroy
Signature: Timothy J McElroy
Month Day Year: 10 31 92

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

1 — TSD MAIL TO - TSD'S STATE

APR-15-1992 09:59AM FROM CWMNJ TO 9393661O P.02

Allied Signal Aerospace Company

Manifest Doc. No.: 1 0 0 0 9

...te Number: 3 3 6 2 5

State Manifest No.: NJA 0996947

...s this waste a non-wastewater or a wastewater? (See 40 CFR 268.2) Check ONE: ☒ Non-Wastewater ☐ Wastewater

2. If this waste is subject to any California List restrictions enter the letter from below (either A, B1, or B2) next to each restriction that is applicable: ____HOCs, ____PCBs, ____Acid, ____Metals, ____Cyanides.

3. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Also check which treatment standards apply. Spent solvent and California List treatment standards are listed on the back of this form. If F039, multi-source leachate applies, those standards must be attached by the generator.

REF #	4. US EPA HAZARDOUS WASTE CODE(S)	5. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		6. APPLICABLE TREATMENT STANDARDS		7. HOW MUST THE WASTE BE MANAGED ENTER THE LETTER FROM BELOW
				6.a - PERFORMANCE-BASED: CHECK AS APPLICABLE	6.b - SPECIFIED TECHNOLOGY: IF APPLICABLE ENTER THE 40 CFR 268.42 TABLE 1 TREATMENT CODE(S)	
		DESCRIPTION	NONE	268.41(a) 268.43(a)	268.42(a)	
1	F 006		X	X X		A
2						
3						
4						
5						
6						
7						
8						
9						
10						

To list additional USEPA waste code(s) and subcategory(s), use the supplemental sheet provided (CWM-2001-B) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 7 above, enter the letter (A, B1, B2, B3, C, or D) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B2, B3, or D, you are making the appropriate certification as provided below.

A. RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268 Subpart D, 268.32, or RCRA Section 3004(d).

B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

B.3 GOOD FAITH ANALYTICAL CERTIFICATION - FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264 Subpart O or Part 265 Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 7 above.

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I have determined that this waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore, can be land disposed without further treatment. A copy of all applicable treatment standards and specified treatment methods is maintained at the treatment, storage and disposal facility named above. "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth on 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false certification, including the possibility of a fine and imprisonment."

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature Mary Bdzewski Title ENV. ENGINEER Date 3-18-92

PAGES 01 INCLUDING COVER.

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 7 1 4 4 3 3 | Manifest Document No. 1 0 0 0 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO NJ 07608

A. State Manifest Document Number **NJA 0996961**

4. Generator's Phone (201) 393 2727

B. State Generator's ID SAME

5. Transporter 1 Company Name — 6. US EPA ID Number
MARISOL INCORPORATED — N J D 0 2 4 5 4 5 4 4

C. State Trans. ID NJDEPS-[illegible]

7. Transporter 2 Company Name — 8. US EPA ID Number

D. Transporter's Phone (908) 469-5100

E. State Trans. ID

9. Designated Facility Name and Site Address — 10. US EPA ID Number
MARISOL INCORPORATED
125 PASSAIC* FACTORY LANE
MIDDLESEX, NJ 08846 — N J D 0 2 4 5 4 5 4 4

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-5100

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ WASTE 1-1-1 TRICHLOROETHANE, ORM-A, F-001, UN 2831*	0 1 2	M	0 0 6 3 0	L	F 0 0 1
b.	X	RQ WASTE METHYLENE CHLORIDE, ORM-A, F-001, UN 1593	0 0 1	M	0 0 0 5 3	L	F 0 0 1
c.	X	HAZARDOUS WASTE LIQUID, N.O.S., (TRIFLUORO-TRICHLOROETHANE), T-E, NA 9189	0 0 2	M	0 0 1 0 5	L	F 0 0 1
d.	X	RQ TRICHLOROETHYLENE, ORM-A, F-001, UN 1710	0 0 2	M	0 0 1 0 5	L	F 0 0 1

J. Additional Descriptions for Materials Listed Above

a. L/T: 1,1,1 TRICHLOROETHANE 100%
c. L/T: TRIFLUORO[illegible]RICHLOROETHANE 100%
b. L/T: METHYLENE CHLORIDE 100%
d. L/T: TRICHLOR[illegible]THYLENE 100%

K. Handling Codes for Wastes Listed Above

a. T 0 4 | c. T 0 4 | b. T 0 4 | d. T 0 4

15. Special Handling Instructions and Additional Information
MATERIAL TO BE BENEFICIALLY RECLAIMED ACCORDING TO ASAC WASTE MINIMIZATION PLAN. IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: HANS MARK SCHWIND — Signature — Month Day Year: 06 06 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year: 06 06 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year: 06 12 92

NJA 0996961

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

3 — TSD MAIL TO - GENERATOR

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 7 1 4 4 3 3 | Manifest Document No. 1 0 0 0 9

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

4. Generator's Phone (201) 393-2724

A. State Manifest Document Number **NJA 0996961**

B. State Generator's ID SAME

5. Transporter 1 Company Name MARISOL INCORPORATED

6. US EPA ID Number N J D 0 0 2 4 5 4 5 4 4

C. State Trans. ID NJDEPS- 8 1 5 8

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (908) 469-5100

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 PAGE FACTORY LANE
MIDDLESEX, NJ 0884

10. US EPA ID Number N J D 0 0 2 4 5 4 5 4 4

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-5100

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Container No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ WASTE 1-1-1 TRICHLOROETHANE, ORM-A, F-001, UN 9178 2831	001	DM	00055	G	F001
b.	X	RQ WASTE METHYLENE CHLORIDE, ORM-A, F-001, UN 1593	001	DM	00055	G	F001
c.	X	HAZARDOUS WASTE LIQUID, N.O.S., (TRIFLUORO-TRICHLOROETHANE), ORM-E, NA 9189	002	DM	00165	G	F001
d.	X	RQ TRICHLOROETHYLENE,ORM-A, F-001, UN 1710	002	DM	00165	G	F001

J. Additional Descriptions for Materials Listed Above

a. L/T: 1,1,1 TRICHLOROETHANE 100%

c. L/T: TRIFLUOROTRICHLOROETHANE 100%

b. L/T: METHYLENE CHLORIDE 100%

d. L/T: TRICHLOROETHYLENE 100%

K. Handling Codes for Wastes Listed Above

a. T04 c. T04 b. T04 d. T04

15. Special Handling Instructions and Additional Information
MATERIAL TO BE BENEFICIALLY RECLAIMED ACCORDING TO ASAC WASTE MINIMIZATION PLAN. IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-300-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE.

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Printed/Typed Name WARN MARK SCHWIND | Signature | Month 04 Day 16 Year 92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month Day Year

GENERATOR — TRANSPORTER — FACILITY

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

NJA 0996961

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

8 — GENERATOR COPY

Marisol Incorporate
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box[es])

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

MATERIAL		NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
X	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
X	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
X	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

	D001		080		U196
	D002		083		U203
	U001		084		U208
	U002		085		U209
	U003		088		U210
	U004		U092		U211
	U008		U102		U213
	U009		U107		U220
	U012		U108		U225
	U019		U110		U226
	U028		U112		U227
	U031		U113		U228
	U037		U117		U239
	U043		U118		U328
	U044		U121		U330
	U051		U122		U359
	U052		U124	X	D040
	U053		U125		
	U054		U140		
	U055		U152		
	U056		U154		
	U057		U159		
	U069		U161		
	U070		U162		
	U071		U169		
	U072		U171		
	U076		U186		
	U077		U188		
	U078		U191		
	U079		U194		

GENERATOR NOTIFIED

GENERATOR Allied Signal Aerospace MANIFEST No. NJA 0996946 NJ 99696[illegible]

SIGNATURE [signature] DATE 6/8/92

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 7 1 4 4 3 3 — Manifest Document No. 0 0 1 1

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

A. State Manifest Document Number NJA 0996964

B. State Generator's ID SAME

4. Generator's Phone (201) 393-2724

5. Transporter 1 Company Name — 6. US EPA ID Number

C. State Trans. ID NJDEPS 2 x 004 in 1 0 2 5 8

7. Transporter 2 Company Name MARISOL INCORPORATED — 8. US EPA ID Number N J D 0 0 2 4 5 4 5 4 4

D. Transporter's Phone (908) 469-5100

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 FACTORY LANE
MIDDLESEX, NJ 08846

10. US EPA ID Number N J D 0 0 2 4 5 4 5 4 4

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-5100

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Waste ORM-A, NOS DLF RQ HAZARDOUS WASTE LIQUID, N.O.S. (TRICHLOROethane), ORM-A, F-001, UN 1693 DLF	0 0 1	DM	000536	P	D 0 0 1
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
L/T: WATER 99%
a. TRICHLOROETHANE
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. T 0 4
b.
c.
d.

15. Special Handling Instructions and Additional Information
IN CASE OF EMERGENCY, THE 24 HOUR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE

Dec 1484

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are all respects in proper condition for transport by highway according to applicable international and national government regulations.

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	Printed/Typed Name	Signature	Month	Day	Year
	[illegible] HWIND		10	10	92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials	M. Tomaselli		10	10	92
18. Transporter 2 Acknowledgement of Receipt of Materials					

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Cecilia Duncan		10	01	92

NJA 0996964

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

3 — TSD MAIL TO - GENERATOR

In case of an emergency or spill immediately call the state the emergency occ[illegible] in and the N.J. Dept. of Environmental Protection (609) 292-5560 (Day) (609) 292-7172 (Night)

VHW-001 (REV. 9/86)

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 7 1 4 4 1 3 | Manifest Document No. 3 1 0 0 1 1

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46
TETERBORO, NJ 07608

A. State Manifest Document Number **NJA 0996964**

B. State Generator's ID SAMS

4. Generator's Phone (201) 393-2724

5. Transporter 1 Company Name: MARISOL INCORPORATED | 6. US EPA ID Number: N J D 0 0 4 5 4 5 4 4

C. State Trans. ID NJDEPS- 8-1-5-0

7. Transporter 2 Company Name | 8. US EPA ID Number

D. Transporter's Phone (908) 469-5100

E. State Trans. ID

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 FACTORY LANE
MIDDLESEX, NJ 08846 | 10. US EPA ID Number: N J D 0 0 4 5 4 5 4 4

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (908) 469-5100

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X RQ HAZARDOUS WASTE LIQUID, N.O.S., (TRICHLORO-ethane), ORM-E, F-001, UN 2831	001	DM	000536		F001
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
L/T: WATER 99%
a. TRICHLOROETHANE 1%
b.

K. Handling Codes for Wastes Listed Above
a. T04 c.
b. d.

15. Special Handling Instructions and Additional Information
IN CASE OF EMERGENCY, THE 24 HR RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED DOT RESPONSE GUIDE.

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Printed/Typed Name: MARK SCHWIND | Signature | Month Day Year: 06 16 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

8 — GENERATOR COPY

GENERATOR

TRANSPORTER

FACILITY

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NJA0996964

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 7 8 7 1 4 4 3 3 | Manifest Document No. 1 0 0 0 9 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ALLIED-SIGNAL AEROSPACE COMPANY
ROUTE 46 TETERBORO, NJ 07608

4. Generator's Phone (201) 393-2724

A. State Manifest Document Number **NJA 0996961**

B. State Generator's ID SAME

5. Transporter 1 Company Name MARISOL INCORPORATED | 6. US EPA ID Number N J D 0 0 2 4 5 4 5 4 4

C. State Trans. ID NJDEPS-[illegible]

7. Transporter 2 Company Name | 8. US EPA ID Number

D. Transporter's Phone (908) 469-5100

9. Designated Facility Name and Site Address
MARISOL INCORPORATED
125 PARK* FACTORY LAN
MIDDLESEX, NJ 08846

10. US EPA ID Number N J D 0 0 2 4 5 4 5 4 4

E. State Trans. ID

F. Transporter's Phone ( )

State Facility's ID

Facility's Phone (908) 469-5100

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X RQ WASTE 1-1-1 TRICHLOROETHANE, ORM-A, F-001, UN 1993* 2631	012	DM	00630	G	F001
b.	X RQ WASTE METHYLENE CHLORIDE, ORM-A, F-001, UN 1593	001	DM	00053	G	F001
c.	X HAZARDOUS WASTE LIQUID, N.O.S., (TRIFLUORO-TRICHLOROETHANE), OIL-E, NA 9189	002	DM	00105	G	F001
d.	X RQ TRICHLOROETHYLENE ORM-A, F-001, UN 1710	002	DM	00105	G	F001

J. Additional Descriptions for Materials Listed Above

a. L/T: 1,1,1 TRICHLOROETHANE 10%

b. L/T: METHYLENE CHLORIDE 10%

c. L/T: TRIFLUOROTRICHLOROETHANE 100%

d. L/T: TRICHLOROETHYLENE 00%

K. Handling Codes for Wastes Listed Above

a. T 0 4 | c. T 0 4 | b. T 0 4 | d. T 0 4

15. Special Handling Instructions and Additional Information

MATERIAL TO BE BENEFICIALLY [illegible] CLAIMED ACCORDING TO ASAC WASTE MINIMIZATION PLAN. IN CASE OF EMERGENCY, THE 24 HOUR [illegible] OTHER RESPONSE INFORMATION TELEPHONE IS CHEMTREC 1-800-424-9300, AND REFER TO ATTACHED [illegible] RESPONSE GUIDE.

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Printed/Typed Name: HANS MARK SCHWIND | Signature | Month Day Year: 06 08 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: [illegible] | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month Day Year

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

GENERATOR

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NJA 0996961

MARISOL, INC.
125 FACTORY LANE
MIDDLESEX, NJ 08846
908-469-5100
FAX 908-469-1957

BROKER / DIRECT

MATERIAL PROFILE

No.

Generator Name: ALLIED-SIGNAL AEROSPACE COMPA

Mailing Address: ROUTE 46
TETERBORO, NJ 07608

Facility Address (If different from above):

Generator EPA ID No.: NJD078714433

Generator Contact: MARK SCHWIND

Title: ENVIRONMENTAL ENGINEER

Phone: (201) 393-2724

Description of Material: water and trichloroethane

Process Which Generates This Material (Be Specific): DEGREASER CLEANOUT

Volume: 55 GALLONS

Frequency: 1 TIME/3 MONTHS

Packing: (Drums) Bulk

ENTER ALL COMPOSITIONAL DATA IN WEIGHT PERCENT

Physical State @ 70° F: Solid | (Liquid) | Semi-Solid

Viscosity — Value: N/A Units:

Layering: (None) | Bilayered | Multilayered

Material is Not Compatible With The Following:

Suspended or Dissolved Solids By Volume — Minimum: Maximum: Total:

Settleable Solids by Volume: Minimum: N/A Maximum: Total:

Specific Gravity — Standard Units @ 60°F: 1.0

Flash Point — Temperature: N/A Method:

Thousands of BTU's per Pound: <1 | 1 - 5 | 5 - 9 | 9 - 12 | 12 - 16 | 16 - 20

pH: Standard Units: N/A

Organically Bound Chlorine by weight: Value: Method:

Odor: None Mild Strong — Describe:

Organically Bound Sulfur by Weight: Value: Method:

PLEASE IDENTIFY AND QUANTIFY ALL KNOWN COMPONENTS AND/OR CONTAMINANTS. IF ANALYSIS WAS PERFORMED OTHER THAN REQUESTED, PLEASE AMEND ACCORDINGLY.

CHEMICAL COMPOSITION (Attach Appropriate MSDS's)

SUBSTANCE (Totals must add to 100%)	Min.	Max.	Avg.
1,1,1 TRICHLOROETHANE			1
WATER			99

METALS AND OTHER SUBSTANCES ☐ Total ppm ☐ TCLP ☐ none

Arsenic (As)	Beryllium (Be)
Barium (Ba)	Cobalt (Co)
Cadmium (Cd)	Copper (Cu)
Chromium (Cr)	Manganese (Mn)
Lead (Pb)	Zinc (Zn)
Mercury (Hg)	Antimony (Sb)
Selenium (Se)	Other
Silver (Ag)	PCB's (ppb)
Nickel (Ni)	Cyanides
Thallium (Th)	Pesticides

PLEASE ATTACH ANY ADDITIONAL HAZARD AND HANDLING INFORMATION TO THIS SHEET

EPA Waste No.: F 001

DOT Proper Shipping Name: HAZARDOUS WASTE LIQUID, N.O.S., f 001

New Jersey Waste No.: N/A

DOT Hazard Class: ORM-E

UN/NA ID No.: UN 2831

TO THE BEST OF MY KNOWLEDGE AND ABILITY TO DETERMINE, THIS IS A COMPLETE AND ACCURATE DESCRIPTION OF THIS MATERIAL

Signature: R Kellogg

Date: JUN 05 1992

Marisol Incorporate
125 Factory Lane
Middlesex, N.J. 08846

This notice is being sent to you in accordance with 40 CFR 268.7 to inform you that this shipment contains the solvents identified below which are restricted from landfill. You should be aware that the residues from the treatment of these materials may not be landfilled unless the concentration is below the applicable non-wastewater treatment standard(s).

Manifest contains the following EPA Hazardous Waste Numbers: (check box[es])

F001-> [X] F002-> [ ] F003-> [ ] F004-> [ ] F005-> [ ]

The following materials are contained in the waste stream:

	MATERIAL	NON-WASTEWATER TREATMENT STANDARD (mg/l)
	Acetone	0.590
	Benzene	3.700 (total)
	n-Butyl Alcohol	5.000
	Carbon Disulfide	4.810
	Carbon Tetrachloride	0.960
	Chlorobenzene	0.050
	Cresols (and Cresylic Acid)	0.750
	Cyclohexanone	0.750
	1,2 Dichlorobenzene	0.125
	2-Ethoxyethanol	Incineration
	Ethyl Acetate	0.750
	Ethyl Benzene	0.053
	Ethyl Ether	0.750
	Isobutanol	5.000
	Methanol	0.750
	Methylene Chloride	0.960
	Methyl Ethyl Ketone	0.750
	Methyl Isobutyl Ketone	0.330
	Nitrobenzene	0.125
	2-Nitropropane	Incineration
	Pyridine	0.330
	Tetrachloroethylene	0.050
	Toluene	0.330
X	1,1,1-Trichloroethane	0.410
	1,1,2-Trichloroethane	7.600 (total)
	1,1,2-Trichloro-1,2,2-Trifluoroethane	0.960
	Trichloroethylene	0.091
	Trichlorofluoromethane	0.960
	Xylene	0.150

PLEASE RECYCLE AT YOUR SITE!!

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

_____ D001	_____ U[illegible]9	_____ U196
_____ D002	_____ U0[illegible]	_____ U203
_____ U001	_____ U[illegible]	_____ U208
_____ U002	_____ U085	_____ U209
_____ U003	_____ U088	_____ U210
_____ U004	_____ U092	_____ U211
_____ U008	_____ U102	_____ U213
_____ U009	_____ U107	_____ U220
_____ U012	_____ 108	_____ U225
_____ U0[illegible]9	_____ 110	_____ U226
_____ U0[illegible]8	_____ 112	_____ U227
_____ U0[illegible]1	_____ 113	_____ U228
_____ U[illegible]7	_____ 117	_____ U239
_____ U043	_____ 118	_____ U328
_____ U044	_____ 121	_____ U353
_____ U051	_____ 122	_____ U359
_____ U052	_____ 124	_____ _____
_____ U053	_____ 125	_____ _____
_____ U054	_____ 140	_____ _____
_____ U055	_____ 52	_____ _____
_____ U056	_____ 154	_____ _____
_____ U0[illegible]7	_____ 159	_____ _____
_____ U0[illegible]9	_____ 161	_____ _____
_____ U070	_____ 162	_____ _____
_____ U071	_____ U169	_____ _____
_____ U0[illegible]2	_____ U171	_____ _____
_____ U0[illegible]6	_____ U186	_____ _____
_____ U0[illegible]7	_____ U188	_____ _____
_____ U078	_____ 191	_____ _____
_____ U079	_____ 94	_____ _____

GENERATOR Allied Signal Aerospace MANIFEST No. MS NJA ~~0996946~~ 0996964

SIGNATURE [signature] DATE 6/8/92

STATE OF ILLINOIS — ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

P.O. BOX 19[illegible] SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS AND SPECIAL WASTE.

State Form LPC 62 8/81 IL532-0610[illegible]

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter.) EPA Form 8700-22 (Rev. 9-88) Form Approved. OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N D078714433 | Manifest Document No. 0993 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: Allied-Signal Aerospa[illegible] Route 46 Teterboro, NJ 7608

Location If Different: company

4. Generator's Phone (201) 393- 724

A. Illinois Manifest Document Number: IL 3412239 MANIFEST FEE EXEMPT

B. Illinois Generator's ID: 9340035417

5. Transporter 1 Company Name: Freehold Cartage, Inc. | 6. US EPA ID Number: NJD0[illegible]4126164

C. Illinois Transporter's ID: 1540

D. ([illegible]) 462-1001 Transporter's Phone

7. Transporter 2 Company Name | 8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: CP Inorganics, 10 Industrial Ave., Joliet, IL 60435 | 10. US EPA ID Number: ILD062480850

G. Illinois Facility's ID: 1970250002

H. Facility's Phone: (815) 727-4465

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Waste Corrosive Liquid, N.O.S. (Cupric Chloride) (D002, D008) UN 1760, DOTE 9/166	0.02	DM	00105	1	EPA HW Number XXD002; Authorization Number 0000065
b. (RQ=100#) Waste Ammonium Hydroxide Solution Corrosive Liquid (D002) NA 2672	0.08	DM	00420	1	EPA HW Number XXD002; Authorization Number 000059
c.					EPA HW Number XX; Authorization Number
d.					EPA HW Number XX; Authorization Number

J. Additional Description for Materials Listed Above: A. Waste Cupric Chloride Solution for Recovery which is part of OUR Program of Waste Minimization. B. L/C: Ammonium Hydroxide 35% Water 65%

K. Handling Codes for Wastes Listed Above In Item #14: 1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information: In case of Spill, Refer to Attached DOT Response Guide No. 60, Contact 24 hr. emergency Response telephone # Chemtrec 1-800-424-9300.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: William A. Hooper | Signature: William C. Hooper | Date: Month Day Year 06 22 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Bob Sommers | Signature: Bob Sommers | Date: Month Day Year 06 22 92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: S. Salkowski | Signature | Date: Month Day Year 6-25-92

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

JUN 25 '92

In case of a spill call the Illinois Office of Emergency Response at 217 / 782-3637 and the National Response Center at 800 / 424-8802 or 202 / 426-2675.

LAND DISPOSAL RESTRICTION NOTICE

In accordance with 40 CFR 268.7 this notice is to inform you that these wastes are restricted from land disposal unless they are treated: 1.) to below the treatment standards specified in 268.41 or 2.) in accordance with the technology-based standards defined in 268.42, namely, FSUBS (Fuel substitution), INCIN (Incineration) and/or RORGS (Recovery of organics).

The wastes are:

_____ D001	_____ U080	_____ U196
_X_ D002	_____ U083	_____ U203
_____ U001	_____ U084	_____ U208
_____ U002	_____ U085	_____ U209
_____ U003	_____ U088	_____ U210
_____ U004	_____ U092	_____ U211
_____ U008	_____ U102	_____ U213
_____ U009	_____ U107	_____ U220
_____ U012	_____ U108	_____ U225
_____ U019	_____ U110	_____ U226
_____ U028	_____ U112	_____ U227
_____ U031	_____ U113	_____ U228
_____ U037	_____ U117	_____ U239
_____ U043	_____ U118	_____ U328
_____ U044	_____ U121	_____ U353
_____ U051	_____ U122	_____ U359
_____ U052	_____ U124	
_____ U053	_____ U125	
_____ U054	_____ U140	
_____ U0[illegible]5	_____ U152	
_____ U0[illegible]6	_____ U154	
_____ U057	_____ U159	
_____ U069	_____ U161	
_____ U070	_____ U162	
_____ U071	_____ U169	
_____ U072	_____ U171	
_____ U076	_____ U186	
_____ U077	_____ U188	
_____ U078	_____ U191	
_____ U079	_____ U194	

GENERATOR Allied Signal Aerospace MANIFEST No. EC 34/12239 [redacted] WAB

SIGNATURE William A Hooper DATE 6-22-92

RCRA INSPECTION FORM

Report Prepared for:

Generator ☒

Transporter ☐

TSD facility ☒

Copy of report ~~requested by~~ sent to the facility ☐

Facility Information

Name: Bendix Corp.

Address: Route 46
Teterboro, NJ

EPA ID#: NJD078714433

Date of Inspection: 4/8/82

Participating Personnel

State or EPA Personnel: Angela Morales

Facility Personnel: William Hooper
(Plant Manager)

Report Prepared by Name: Angela Morales

Agency: U.S. EPA ES. Div.

Telephone #: (201) 321-6623

Approved for the Director by: _____

Facility Description

The Bendix Corp., Guidance System Division, located in Teterboro, N.J. manufactures guidance equipment for missiles. Part of this manufacturing process involves plating operations which generate waste rinse waters and a concentrated plating bath. These wastes are put through Bendix's waste water treatment plant where the metals are precipitated and a metal hydroxide sludge is generated. The treated waste rinse water is discharged in accordance with their NPDES permit. The waste sludge which according to a company official, is hazardous, is sent to the SCA secure landfill in South Carolina.

There are instances when the concentrated plating baths are not put through the waste-water treatment plant (the latter not being able to handle the load), and are drummed and shipped out as hazardous.

The following is a summary of all the wastes that Bendix informed the EPA inspectors that they generated:

1) Metal hydroxide Sludge - generated as a precipitate from Bendix's waste water treatment plant. Approximately 55 fifty-five gallon

RCRA INSPECTION FORM

Report Prepared for:

Generator [X]

Transporter [ ]

TSD facility [X]

Copy of report ~~requested by~~ sent to the facility [ ]

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Address: Route 46
Teterboro, NJ

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Facility Personnel: William Hooper
(Plant Manager)

Report Prepared by Name: Angela Morales

Agency: U.S. EPA ES.Div.

Telephone #: (201) 321-6623

Approved for the Director by: _____

drums of this metallic sludge is generated every 6 months. None of this waste was on site during the time of the inspection.

2) Concentrated Plating Bath Solutions - generated when solution can no longer be regenerated. In other words, when the solution becomes contaminated and plating produces lumps on the circuit boards. There is no set schedule for disposal of this solution since contamination depends on product demand and use of the plating bath. Most of this waste goes through the treatment plant. Whatever cannot be handled through the waste water treatment plant is drummed and sent out for disposal. There was no waste which was drummed for outside disposal during the time of the inspection.

3) Waste Solvents (1,1,1 Trichloroethane; ethylene and Freon) — generated from the degreasing and painting operations in the assembly works department. Solvents are used to clean all machine parts, printed circuit boards and any thing that requires degreasing. Approximately 2 fifty-five gallon drums of

1,1,1 trichloroethane, - ethylene is generated every 2 weeks. The freon waste on site was a one time occurrence.
During the site inspection, there were approximately 3 fifty-five gallon drums of 1,1,1-trichloroethylene, 10 fifty-five gallon drums of 1,1,1-trichloroethane and 4 fifty-five gallon drums of freon.

4) Poisonous Beryllium Waste Dust- generated from the machining of beryllium parts. A vacuum is placed on these machines which accumulates beryllium, metal chips and a fine oil residue. According to the company official, 90% of this waste dust consists of steel chips. Approximately 1-2 lbs of the beryllium waste dust is generated/month. But, in 1981 a total of 236 lbs of this waste was generated. A Company official stated that Bendix was trying to do away with the beryllium machining. None of this waste was on site during the time of the inspection.

5) Waste Oils - generated from the lubrication of parts and replacement of the cooling oils in the sump pumps. In lubricating the parts, oil is pumped on the part and collected and reused. This oil is contaminated with metal chips. These waste oils are stored in an underground tank which also contains contaminated material from the paint department. The tank capacity is 10,000 gallons and approximately 5,000 gallons of this waste is generated/year. Approximately 3,300 gallons of waste was being stored in the tank during the time of the inspection.

6) Remove Resist Cleaner (1112A Stripper) - A maximum of 3 fifty-five gallon drums are generated/week. Bendix waits for 24 drums to accumulate and then calls SCA who pumps it into their own tank truck and transports it to a disposal site. During the time of the inspection, approximately 12 drums were on site.

7) Electroless Copper (Developer) - generated from the plating operation. Electroless Copper is a chemical plating solution that allows you to plate on plastic without a current. It also removes the Resist material from the patterns of the circuit boards. Approximately 2 fifty-five gallon drums of waste are generated/week. Approximately 10 drums of this waste were on site.

(1) Is there reason to believe that the facility has hazardous waste on-site?

Yes

a. If yes, what leads you to believe it is hazardous waste? Check appropriate boxes:

[X] Company admits that its waste is hazardous during the inspection.

[X] Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

[X] The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

[ ] The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

[X] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33) 1,1,1 Trichloroethane, -ethylene

[ ] Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

[ ] Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	N/A
Part 262			
Subpart A-General			
262.11 - Hazardous waste determination			
a) Did the generator test its waste to determine whether it is hazardous?		✓	
1) Is the waste hazardous? listed under one of the sources	✓		
b) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	✓		
Subpart B-The Manifest			
Has hazardous waste been shipped off-site since November 19, 1980?	✓		
If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. 26 shipments in 1981. 0 Shipments in 1980. 4 shipments in 1982. Total Shipments = 30 shipments			
262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.			
-- a manifest document number	✓		
-- the generators name, mailing address, telephone number and EPA I.D. #	✓		
-- the name, address and EPA ID# of the designated facility	✓		
-- a description of the wastes (DOT)	✓		
-- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	✓		
-- a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA.	✓		
Subpart C - Pre-Transport Requirements			
262.30 - Is hazardous waste properly packaged according to DOT regulations? (49 CFR Part 172)	✓		
262.31 - Is hazardous waste properly labeled according to DOT regulations? (49 CFR Part 172)	✓		

	YES	NO	N/A
262.33 - Does the facility placard or offer the initial transporter appropriate placards according to the DOT regulations? (49 CFR Part 172)	✓		

262.34 - Accumulation Time

1) How is waste accumulated on-site? Greater than 90 days

containers /✓/ (complete container questions below) surface impoundments / / (complete TSD form also)

tanks /✓/ (complete tank questions on page 4) piles / / (complete TSD form also)

(waste cooling oil underground)

2) Is waste accumulated for less than 90 days?		✓	

CONTAINER

1) Is each container clearly dated with each period of accumulation so as to be visible for inspection?	✓		
2) Is each container marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?	✓		

265.170 - What type of containers are used for storage. Describe the size, type and quantity.(e.g. 12 fifty-five gallon drums)

55-gallon drums. (Please see report for exact quantities for each waste)

265.171 - Do the containers appear to be in good condition, not in danger of leaking?	✓		
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
265.172 - Are hazardous waste stored in containers made of compatible materials? Waste is stored in new metal 55 gallon drums	✓		
If not, please explain.			
265.173(a) - Are all containers closed except those in use?	✓		
265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	✓		

265.174 - How often is the storage area inspected?

Waste Supervisor Charlie DeMartino inspects it daily. Not documented.

	Yes	No	N/A
265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	✓		

Tanks

1) What is the approximate number and size of tanks containing hazardous waste? 10,000 gallon tank containing waste cooling oil.

2) Are tanks maintained so that there is no evidence of present, past, or risk of future leaks? Please circle appropriate elements. ✓
Please explain.

3) Are there leaking tanks? ✓

262.34 (a)(3) Is each tank marked or labeled with the words hazardous waste or with the DOT labeling requirements? ✓

265.192(a) Does it appear that incompatible waste are being stored seperate from each other? ✓

265.192(a) Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? ✓

If not, please explain.

265.192(b) - Are all waste or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures? ✓

If not, please explain.

265.192(c) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure? Underground storage tank. ✓

265.194 - How often is the tank storage area inspected?
Waste Supervisor, Charles DeMartino, inspects it daily - not documented

	YES	NO	N/A
265.16 - Personnel Training			
1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of the regulations or having been employed?	✓		
a) If yes, have facility personnel taken part in an annual review of training? Supervisors receive the training (documented) and claim to give on-the-job training to subordinates.		✓	
2) Is there written documentation of the following:			
--job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?		✓	
--type and amount of training to be given to personnel in jobs related to hazardous waste management?	✓		
--actual training or experience received by personnel?	✓		
3) Are training records kept on all employees for at least 3 years?	✓		

265 - Subpart C - Preparedness and Prevention

265.32-Required Equipment

Does the facility comply with preparedness and prevention requirements including maintaining:

-- an internal communications or alarm system?		✓	
-- a telephone or other device to summon emergency assistance from local authorities?	✓		
-- portable fire equipment?	✓		
-- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	✓		
-- adequate aisle space?	✓		
If not, please explain storage pattern.			
-- in your opinion, do the types of waste on-site require all of the above procedures, or are some not needed? Explain.	✓		

	YES	NO	N/A
265.34 Access to Communications or Alarm Systems			
a) Is there immediate access to communications or alarm systems during handling of hazardous waste? Sometimes - It depends on whether the doors to the building containing the phone are open. The doors are open during the day and closed during the night.	—	—	—
265 - Subpart D - Contingency Plan and Emergency Procedures			
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?	✓	—	—
1) Does the plan describe arrangements made with the local authorities?	—	✓	—
2) Has the contingency plan been submitted to the local authorities? Bendix has local fire department meetings and inspections.	—	✓	—
a) How do you know?			
3) Does the plan list names addresses and phone numbers of Emergency Coordinators?	✓	—	—
4) Does the plan have a list of what emergency equipment is available?	—	✓	—
5) Is there a provision for evacuating facility personnel?	✓	—	—
6) Was there an emergency coordinator present or on call at the time of the inspection?	✓	—	—
7) Have changes occurred that would require amendments to the contingency plan?	—	—	✓
262 - Subpart- D-Recordkeeping and Reporting			
262.40-Recordkeeping			
1) Does the generator maintain facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)	✓	—	—
262.42- Exception Reporting			
1) Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?	✓	—	—
a) If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?	—	—	✓

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Bendix Corp

EPA I.D. Number: NJD078714433

COMPANY ADDRESS: Route 46 Peterboro, NJ

COMPANY CONTACT OR OFFICIAL: William Hooper

TITLE: Plant Manager.

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY:
- ☑ NPDES
- ☐ AIR
- ☐ OTHER

INSPECTOR'S NAME: Angela Morales

BRANCH/ORGANIZATION: E.S. Division

DATE OF INSPECTION: 4/8/82

TIME OF DAY INSPECTION TOOK PLACE: 1 30 p.m.

(1) Is there reason to believe that the facility has hazardous waste on site? Yes

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

- ☑ Company admits that its waste is hazardous during the inspection.
- ☑ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- ☑ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- ☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- ☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- ☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- ☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	—	✓	—

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

Please see report.

(2) Does the facility generate hazardous waste?	✓	—	—
(3) Does the facility transport hazardous waste?	—	✓	—
(4) Does the facility treat, store or dispose of hazardous waste?	✓	—	—

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW
(5) SITE SECURITY (§265.14)			
a. Is there a 24-hour surveillance system?	✓		
b. Is there a suitable barrier which completely surrounds the active portion of the facility?	✓		
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?		✓	
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	✓		
a. If "YES", what are the approximate quantities?			
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?	✓		
c. If "YES", explain Solvent waste is kept separate from source of ignition			
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	✓		
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	✓		
- damage the structural integrity of the device or facility containing the waste?	✓		
- threaten human health or the environment?	✓		

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

Please see report

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?			
- a telephone or other device to summon emergency assistance from local authorities?			
- portable fire equipment?			
- adequate aisle space?			
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.			

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

*(8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? N/A			
If you have, please comment, as appropriate. N/A			
(9) a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. N/A			
b. Do you believe that operation of this facility may affect groundwater quality?			
c. If "YES", explain.			

RECORDS INSPECTION

(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?		✓	
a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received? N/A			
b. How many post-November 19 manifests does it have? If the number is large, you may estimate. N/A			
c. Does each manifest (or a representative sample) have the following information? N/A			
- a manifest document number			

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number			
- the name, and EPA identification number of each transporter			
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;			
- a DOT description of the wastes			
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle			
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA			
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.		✓	
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)		✓	
a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary ____ All wastes are basically the same ✓ Company treats all waste as hazardous ____ Don't Know ____			
b. Does hazardous waste come to this facility from off-site sources?		✓	
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?	N/A		
(12) INSPECTIONS (§265.15)			
a. Does the facility have a written inspection schedule?		✓	
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?		✓	
c. Does the owner/operator record inspections in a log?		✓	
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.		✓	

	YES	NO	DON'T KNOW
(13) PERSONNEL TRAINING (§265.16)			
a. Is there written documentation of the following:			
- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?		✓	
- type and amount of training to be given to personnel in jobs related to hazardous waste management?	✓		
- actual training or experience received by personnel?	✓		
(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51)	✓		
a. Does the plan describe arrangements made with local authorities?		✓	
b. Has the contingency plan been submitted to local authorities?		✓	
How do you know?			
c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators?	✓		
d. Does the plan have a list of what emergency equipment is available?		✓	
e. Is there a provision for evacuating facility personnel?	✓		
f. Was an Emergency Coordinator present or on call at the time of the inspection?	✓		
(15) Does the owner/operator keep a written operating record with: (§265.73)			
- a description of wastes received with methods and dates of treatment, storage or disposal?	N/A		
- location and quantity of each waste?		✓	
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility?	N/A		
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan?		✓	
*(16) Does the facility have written closure and post-closure plans? (§265.110)		✓	
a. Does the written closure plan include:			
- a description of how and when the facility will be partially (if applicable) and ultimately closed?		✓	

	YES	NO	DON'T KNOW
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?			
- a description of the steps necessary to decontaminate facility equipment during closure?			
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?			
b. What is the anticipated date for final closure?			
†c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?			
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure?			
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?			
- the name, address and phone number of a person or office to contact during post-closure?			
*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it?			
*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)			
*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90)			
a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste mangement area?			
b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?			

† This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	
	Other _____	

CONTAINERS (§265.170)

	YES	NO	DON'T KNOW
1. Are there any leaking containers? If "YES", explain.		✓	
2. Are there any containers which appear in danger of leaking? If "YES", explain.		✓	
3. Do wastes appear compatible with container materials?			
4. Are all containers closed except those in use?			
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?		✓	
6. How often does the plant manager claim to inspect container storage areas? Daily but there is no documentation of such.			
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES", explain.		✓	
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	✓		
9. What is the approximate number and size of containers with hazardous wastes? 40, fifty-five gallon drums.			

TANKS (§265.190)

	YES	NO	DON'T KNOW
1. Are there any leaking tanks? If "YES", explain. Underground tank, difficult to determine if it is leaking.	—	—	✓
2. Are there any tanks which appear in danger of leaking. If "YES", explain. Same reason as above.	—	—	✓
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.	—	✓	—
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure? Not Applicable	—	—	—
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow? Not Applicable	—	—	—
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.	—	✓	—
7. How often does the plant manager claim to inspect container storage areas? Daily but this is not documented.	✓	—	—
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.	—	—	—
9. What is the approximate number and size of tanks containing hazardous wastes? One 10,000 gallon tank			

SURFACE IMPOUNDMENTS (§265.220)

1. Is there at least 2 feet of freeboard in the impoundment?	—	—	—
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.	—	—	—
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.	—	—	—

	YES	NO	DON'T KNOW
4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics? If "YES", explain.	___	___	___
5. Are there any leaks, failures or is there any deteriorization in the impoundments? If "YES", explain.	___	___	___
6. Give the approximate size of surface impoundments (gallons or cubic feet).			

WASTE PILES (§265.250)

1. Is the waste pile protected from wind erosion?	___	___	___
a. Does it appear to need such protection?	___	___	___
b. Explain what type of protection exists.			
2. Does it appear that incompatible wastes are being stored in the same waste pile? If "YES", explain.	___	___	___
3. Is leachate run-off from a pile a hazardous waste? If "YES", explain this determination and answer (a) and (b) below.	___	___	___
a. Is the pile placed on an impermeable base that is compatible with the waste?	___	___	___
b. Is the pile protected from precipitation and run-on?	___	___	___
4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.	___	___	___
Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste? Please explain.	___	___	___
5. How many waste piles are on site, and approximately how large are they?			

LAND TREATMENT (§265.270)

1. Can the facility operator demonstrate that the hazardous waste has been made less or [illegible] degradation or

	YES	NO	DON'T KNOW
*2. Is run-on diverted away from the active portions of the land treatment facility?	___	___	___
*3. Is run-off collected?	___	___	___
4. Are food chain crops being grown on the facility property?	___	___	___
a. If "YES", can the facility operator document that arsenic, lead and mercury:			
- will not be transferred to the crop or ingested by food chain animals or	___	___	___
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils.	___	___	___
b. Has notification of the growing of the food chain crops been made to the Regional Administrator?	___	___	___
5. Is there a written and implemented plan for unsaturated zone monitoring?	___	___	___
6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?	___	___	___
7. Do the closure and post-closure plans address:			
a. control of migration of hazardous wastes into the groundwater?	___	___	___
b. control of run-off, release of airborne particulate contaminants?	___	___	___
c. compliance with requirements for the growth of food-chain crops (if they are present)?	___	___	___
8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain.	___	___	___
9. Are incompatible wastes placed in the same land treatment area? If "YES", explain.	___	___	___
10. What is the area of the land receiving hazardous waste treatment?	___	___	___

LANDFILLS (§265.300)

*1. Is run-on diverted away from the active portions of the landfill?	___	___	___
*2. Is run-off from active portions of the landfill collected?	___	___	___

* Effective date for these requirements is May 19, 1981.

	YES	NO	DON'T KNOW
3.. Is waste which is subject to wind dispersal controlled? Explain.	___	___	___
4.. Does the owner/operator maintain a map with:			
- the exact location and dimensions of each cell	___	___	___
- the contents of each cell and approximate location of each hazardous waste type	___	___	___
5.. Do the closure and post-closure plans address:			
- control of pollutant migration via ground water?	___	___	___
- control of surface water infiltration?	___	___	___
- prevention of erosion?	___	___	___
6.. Is ignitable or reactive waste treated before being placed in the landfill? Explain how you know.	___	___	___
7.. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell? If "NO", explain.	___	___	___
8.. Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",	___	___	___
a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?	___	___	___
b. Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
*9. Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?	___	___	___
If so, are they crushed flat, shredded or similarly reduced in volume before they are buried?	___	___	___
11. What is the approximate area of the hazardous waste landfill?			

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* Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMENT
(§§265.340 and 265.379)

	YES	NO	DON'T KNOW
1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?			
2. Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.	—	—	—
3. Has waste analysis been performed (and written records kept) to include:			
- heating value of the waste	—	—	—
- halogen content	—	—	—
- sulfur content	—	—	—
- concentration of lead	—	—	—
- concentration of mercury	—	—	—

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here [ ].

4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?	—	—	—
5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:			
- waste feed	—	—	—
- auxiliary fuel feed	—	—	—
- air flow	—	—	—
- incinerator temperature	—	—	—
- scrubber flow	—	—	—
- scrubber pH	—	—	—
- relevant level controls	—	—	—
Every hour for:			
- stack plume (color and opacity)	—	—	—
6. Is there open burning of hazardous waste?	—	—	—

a. If "YES", what is being burned? (only burning or detonation of explosives is permitted)

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain.	—	—	—
a. Is there any evidence of fugitive emissions?	—	—	—
7. Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.	—	—	—

8. What types of air pollution control devices (if any) are installed on the incinerator?

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (§265.400)

1. Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain.	—	—	—
2. Is there a means to stop the inflow of continuously-fed hazardous wastes?	—	—	—
3. Is there ignitable or reactive waste fed into the treatment system?	—	—	—
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how.	—	—	—
Are the incompatible wastes placed in the same treatment process? If "YES", explain.	—	—	—

4. Describe the treatment system at this facility.